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Nov 12 2020

November 12, 2020

**VIA ELECTRONIC FILING**

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building  
430 North Salisbury Street  
Raleigh, North Carolina 27603

*Re: Motion to Amend Compliance Filing Requirement  
Docket No. E-100, Sub 101*

Dear Ms. Campbell:

Enclosed for filing in the above-referenced proceeding on behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC is its Motion to Amend Compliance Filing Requirement.

Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:sjg

Enclosure

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Petition for Approval of Revisions to	)	
Generator Interconnection Standards	)	MOTION TO AMEND COMPLIANCE
	)	FILING REQUIREMENT
	)	

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, “Duke”), (together, “Movants”) pursuant to Commission Rule R1-7, and move the North Carolina Utilities Commission (“Commission” or “NCUC”) to modify the Commission’s directive in the October 15, 2020 *Order Approving Queue Reform* to incorporate Duke’s agreement with the North Carolina Clean Energy Business Alliance (“NCCEBA”) regarding conditions for acceptance of surety bonds as financial security for the M4 Readiness Milestone as part of the formal North Carolina Interconnection Procedures (“NC Procedures”) and to instead allow the Companies to adhere to this document as a Duke-maintained business policy document, subject to the Commission’s general supervisory oversight.

In support of this Motion, the Movants show the Commission the following:

1. On May 15, 2020, Duke filed its Queue Reform Proposal with the Commission.
2. On June 15, 2020, NCCEBA together with the North Carolina Sustainable Energy Association (“NCSEA”), GreenGo Energy US, Inc. (“GreenGo”), and the North Carolina Utilities Commission—Public Staff (“Public Staff”) filed comments on Duke’s Queue Reform proposal.

3. On August 31, 2020, Duke, Dominion Energy North Carolina (“Dominion”), NCCEBA/NCSEA, and Public Staff filed reply comments or letters in lieu of comments on the Companies’ Queue Reform proposal.

4. On October 15, 2020, the Commission issued its *Order Approving Queue Reform*. Ordering Paragraph 2 directed Duke to submit a compliance filing on November 13, 2020, providing the Commission a complete and correct redline of changes to the NCIP, compared to the current NCIP, as required to implement Duke’s queue reform proposal. Ordering Paragraph 2 further directed that the redline should incorporate Attachment 2 (Transitional Cluster System Impact Study Agreement) and Attachment 3 (Conditions for Acceptance of Surety Bond as Financial Security for M4 Readiness Milestone) from Duke’s August 31, 2020 reply comments filing.

5. In preparing the Queue Reform redline to the NC Procedures for filing with the Commission, Duke has identified that Attachment 3 to its reply comments presents Duke-specific standards and requirements for administration of the NC Procedures that were not drafted or submitted to the Commission with the intention of including in the NC Procedures.

6. This Duke-specific internal business policy document presents the terms and conditions pursuant to which Duke will accept a surety bonds as financial security for the M4 Readiness Milestone. For the avoidance of doubt, Duke has agreed with NCCEBA to accept surety bonds at M4 under the terms prescribed in the Attachment 3, and will do so for all Interconnection Customers. Further, any changes to this business policy would be discussed with NCCEBA and Public Staff and, ultimately, would be subject to the Commission’s general supervisory oversight of the generator interconnection process in

North Carolina. However, the Companies do not believe this business policy document should be incorporated into the NC Procedures.

7. Based on the foregoing, the Movants request that the Commission modify Ordering Paragraph 3 to require Duke to incorporate only the Attachment 2 (Transitional Cluster System Impact Study Agreement) in the Queue Reform redline of the NC Procedures and to treat Attachment 3 (Conditions for Acceptance of Surety Bond as Financial Security for M4 Readiness Milestone) as a business policy document to be adhered to by Duke for purposes of implementing the new Definitive Interconnection Study Process under the NC Procedures.

8. Counsel for Dominion, NCCEBA, NCSEA, GreenGo and the Public Staff have authorized counsel for Duke to represent that these parties do not object to the requested modification to Ordering Paragraph 2 of the *Order Approving Queue Reform*, subject to Duke's commitments herein.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, respectfully request that the Commission grant relief requested in this Motion and provide any further relief as the Commission deems just and proper.

Respectfully submitted, this the 12<sup>th</sup> day of November, 2020.

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*Attorneys for Duke Energy Carolinas, LLC  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Motion to Amend Compliance Filing Requirement*, as filed in Docket No. E-100, Sub 101, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 12<sup>th</sup> day of November, 2020.

*/s/E. Brett Breitschwerdt*

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